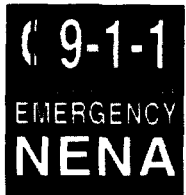


NATIONAL EMERGENCY NUMBER ASSOCIATION

GEORGIA CHAPTER



To: Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

From: James M. Dye
Chairman PCS Committee, Georgia NENA
140 N. Marietta Pkwy.
Marietta, Ga. 30060

Ref: Comment to Notice of Proposed Rule Making
CC Docket No. 94-102, RM-8143

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Dear Sirs,

First I would like to take this opportunity to thank you for taking the position of strong support for the 911 community. We are very appreciative of this stance. The issues at hand in this Rule Making will affect the course of public safety dispatching for the foreseeable future. The care and foresight that you are taking now will have a profound effect and will largely determine our ability to deliver effective service. We take great pleasure in you support.

I am responding as the Chairman of the Georgia NENA a diverse group of 218 members representing the 911 community in our state. We would like to comment on Topics III and IV. Although our organization encompasses a wide range of technical knowledge and expertise, our comments will not be technical in nature. Our position is one of public safety dispatching and as such we will be offering comments on the operational aspects of these Topics. Our comments are as follows:

Topic III, Compatibility of PBX Equipment with 911 Systems, is of great concern to all 911 system operators. All 911 centers have been familiar the operational problems created by PBX systems since the inception of Enhanced 911. From the operational aspect it is imperative that 911 operators receive accurate ALI from PBX callers. We are in support of the Adcom Petition and concur with your intent to adopt this standard in general. There are several individual provisions of the Adcom Petition that we desire to address specifically.

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911 AVAILABILITY

There are several operation concerns that are involved in the issue of dialing 911 or 9-911. In essence our organization is taking no position on this issue in that we feel there are off-setting advantages and disadvantages. Depending on the users familiarity with their system, they could either dial 9 to get out as was their custom when in this case they did not need to, or react to the emergency and dial 911 when in fact they needed to dial 9-911. Either case presents problems in delayed calls and accidental calls will be the same. We take no position as to which would be best but do recommend that training and labelling of what is the correct procedure be required.

ATTENDANT NOTIFICATION

We concur with your proposal to require attendant notification when one is present as long as the notification process does not impede the normal flow of the call routing and does not interfere with subsequent 911 transfers.

ALI DATABASE MAINTENANCE

We concur with your proposal to require the owners of PBX systems to perform database maintenance for their systems. The it is our opinion that 911 Centers could not accurately maintain this information accurately without an extraordinary effort.

STATION NUMBER IDENTIFICATION

The essence of Enhanced 911 is location, we concur with your proposal that PBX systems provide at a minimum - caller telephone number, caller location identification, and call-back number information.

IMPLEMENTATION SCHEDULE

We concur with the implementation schedules of one year for manufacture or importation and eighteen months for newly installed systems.

Topic IV, Wireless Services, does present crucial issues to the 911 community and the Chapter has taken a strong position on this new technology. As you are aware the cellular industry has a profound impact on 911 services now; with most Centers in Georgia having cellular calls at 18% to 25% on total call volume. A large increase in similar type units, Wireless, will even more drastically affect our operation. This is particularly true considering the volume of sales anticipated for Wireless units. As you have rightfully foreseen we must take action now.

911 AVAILABILITY:

Our opinion is that 911 access should be at the widest levels possible. This would be of more importance in a "roaming basis" than in the subscribers home service area. We concur with your one year time limit and encourage you to mandate 911 service without user validation in both home and roaming environments.

GRADE OF SERVICE:

We concur that no Federal response is appropriate at this time. The levels of service will be dependent on various numbers of suppliers who must reach a consensus on this issue. Because of the varying levels of service and technological environments a rule making may be unworkable.

911 CALL PRIORITY:

We concur that 911 calls should be given priority on a first-in-queue basis rather than a preemptive basis. Users should be given some indication that they are in queue rather than a busy signal, from our experience this would create a situation of repeated hang-ups and redials, further complicating the priority process. The one year time limit will be sufficient for operational purposes.

USER LOCATION INFORMATION:

This has obviously been the area of most concern among public safety communications. Location is the single most significant piece of information in public safety dispatching; without location we can do nothing. On the other hand we are not unaware of the tremendous technological difficulties facing the vendors contemplating providing this service.

We concur with the 5 year phase-in plan, but only reluctantly. Time is necessary to make these technological changes and implementations. However, the 911 Centers must deal with the new technology as best they can during the 5 year period. Unfortunately for those of us in Georgia, 5 years will be too late as the Olympics are coming in 1996. We expect to be at the leading edge of the new markets for wireless systems during this time span. As such we will be in the center of the first installs of wireless users at a time when our capacities will be stretched to the limit already.

A secondary issue will be how this information is received at a 911 Center. I know of no center that currently uses latitude and longitude for geographical location calculations. Most use other more local delineators such as streets or land lots as their geographical data base. We do however concur that latitude and longitude is a reasonable solution. In order to obtain this crucial location 911 Centers will be willing to work through whatever conversion process that is necessary to make latitude and longitude an effective solution.

RE-RING/CALL BACK

We concur with the 3 year time limit to provide call back information to 911 centers in receipt of wireless 911 calls.

We offer no comment on Common Channel Signaling, Access to TTY, or Equipment Manufacture.

Thank you again for this opportunity to comment and for the large steps you have taken in supporting our industry.